

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

GIRAFA.COM, INC.,

Plaintiff,

v.

SMARTDEVIL INC.,

Defendants.

C.A. No. 07-787-SLR

**REDACTED
PUBLIC VERSION**

**DECLARATION OF SHIRLI RAN
IN SUPPORT OF PLAINTIFF GIRAFA.COM, INC.'S
MOTION FOR ENTRY OF DEFAULT JUDGMENT
AGAINST DEFENDANT SMARTDEVIL, INC.**

I, Shirli Ran, hereby declare as follows:

1. I am the Chief Operating Officer (“COO”) for Girafa.com, Inc. (“Girafa”) and have held this position since 1999. As COO of Girafa, I oversee the company’s product development, operational and business activities.
2. I have personal knowledge of the following facts and, if called as a witness, could and would competently testify thereto.
3. Girafa was formed in 1999 and, since this time, it sought to be and has been an industry leader in revolutionizing the experience of information search and Web navigation on the Internet via its thumbnail services that allow internet users to preview a hyperlinked URL without leaving the page they are viewing and without accessing or loading the hyperlinked page. These previews are thumbnail-sized visual images of the hyperlinked website/s. The previews can be displayed automatically by the website and/or the controlling software, or can be displayed based in part on the user’s cursor or mouse movement. (An example of a “hyperlinked

URL” is a search result listing displayed by a search engine website after a user conducts a search).

4. Girafa’s business plan is largely based on the technology described in Girafa’s U.S. Patent No. 6,864,904 (“‘904 patent”).

5. Since 2000/2001, Girafa’s business model for generating its revenue has been to create thumbnail images (“thumbnails”) of web pages, and charge its customers for accessing these thumbnails stored on Girafa’s image servers, and for serving these thumbnails for display on customers’ sites. For example, customers seeking to display thumbnails of search results listing on their own websites pay Girafa based on the number of thumbnails they want Girafa to create, and the number of thumbnails they need Girafa to serve their users from Girafa’s image servers.

6. Girafa instituted this business model in 2000, and it was initially successful because of the technology described in the ‘904 patent. Girafa’s sales of thumbnail services initially grew from **REDACTED**

7. Girafa’s sales of thumbnails have decreased significantly over the last few years when competitors like Smartdevil Inc. (Smartdevil) began offering the same thumbnail services.

8. Smartdevil uses its websites www.thumbshots.com, www.thumbshots.org, and www.thumbshots.net to advertise, demonstrate, sell, and give away for free, access to thumbnail images of websites as well as code to display those thumbnails on the user’s computer or customer’s website.

9. Smartdevil’s website reports that it serves over 200 Million thumbnails per month. Attached hereto as **Exhibit A** is a true and correct copy of a screenshot of the web page

Ran Declaration
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Page 3

<http://www.thumbshots.com/Support/Announcements.aspx>, dated November 22, 2009. Page 3 of 4 of Exhibit A states that Smartdevil's Thumbshots websites are "Now serving over 200 million thumbshots per month."

10. Girafa charges approximately \$0.20/1000 thumbnails,

REDACTED

Since the filing of this lawsuit, that amounts to approximately \$860,000 to date.

11. Smartdevil's continued use of Girafa's patented technology is causing Girafa to lose market share that cannot be replaced unless Smartdevil stops infringing the '904 patent. The loss of market share and customers is expected to continue and to increase,

REDACTED

12. Attached hereto as **Exhibit B** is a true and correct copy of a screenshot of the web page <http://www.ip-address.com/whois/www.thumbshots.com>, dated November 25, 2009, explaining that the servers for www.thumbshots.com are located in Dallas Texas.

13. Attached hereto as **Exhibit C** is a true and correct copy of a screenshot of the web page <http://www.ip-address.com/whois/www.thumbshots.org>, dated November 22, 2009, explaining that the servers for www.thumbshots.org are located in Dallas Texas.

14. Attached hereto as **Exhibit D** is a true and correct copy of a screenshot of the web page <http://www.ip-address.com/whois/www.smartdevil.com>, dated November 25, 2009, explaining that Smartdevil's servers are located in Dallas Texas.

Ran Declaration
Confidential - Filed Under Seal
Page 4

15. Attached hereto as **Exhibit E** is a true and correct copy of a screenshot from the website <http://www.thumbshots.com>, dated February 3, 2008.

16. Attached hereto as **Exhibit F** is a true and correct copy of a screenshot from the web page <http://learn.thumbshots.com>, dated December 7, 2009.

17. Smartdevil has used and is still using Girafa's name in Smartdevil's Thumbshots website to obtain potential customers that are searching for Girafa, as shown in **Exhibits E and F**. Both of these exhibits include the sentence "Whether you're searching for a car, flower, photo, or girafa, thumbshots will help you find it quickly and accurately." (emphasis added).

18. Smartdevil has submitted prior art and other information to the Canadian Patent Office in five Protests that Smartdevil filed against Girafa's Canadian counterpart application. These Protests were filed on April 9, 2008, April 28, 2008, May 15, 2008, October 27, 2009, November 25, 2009.

I declare under the penalty of perjury that the above is true and accurate to the best of my knowledge.

Dated: January 21, 2010

By: Shirli Ran
Shirli Ran

EXHIBIT A

THUMBSHOTS

☐ Web ☒ Site

[Search](#)

[Free Signup](#) | [Login](#)


[Home](#) | [Products](#) | [Community](#) | [Support](#) | [Demo](#)

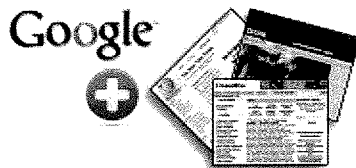
Visit: [Support](#) > [Announcements](#)

November 22, 2009

Do you Google?

Get [Google](#) with Thumbshots.

Reviewed by .



Bigger
Thumbshots
Tiny Price



Thumbshots Demo

Demo 1:

Demo 2: [Thumbshots Directory](#)

Demo 3: [Thumbshots Ranking!](#)

Demo 3: [Thumbshots for Blog](#)

Thumbshots in Directory

How Thumbshots look like in your search engine.

www.thumbshots.net

Announcements

Spring is in the Air!

What a harsh winter it was this year. But now Spring is in the air! I can feel the fresh breeze, see the flowers grow and sun shining. So to keep the spirit, we updated our site with some spring theme! Hope

you like it. 

New Thumbshot Poll added

We just added a new poll on our site. From our previous survey on web services. We uncovered that 35% of users use webservices while another 35% don't. The remaining 30% of users have no idea what it is.

What it means for us is to improve on our integration code with a more simple javascript drop code!

[Previous Surveys](#)

Forum now open to Thumbshots Users

We added a new forum to Thumbshots so users can share questions, answers and ideas with everyone! We'll be monitoring the forum for questions and do our best to answer them quickly.

Allowed Flash applications to pull



Translate with Thumblator



“

Thumbshots is so cool I just wonder why someone didn't do it a long time ago -
Aaron Wall -

”

SEOBOOK
LINKS, RANK, CRAWLERS

[send us your feedback](#)

NetworkSolutions
BRUCE CLAY, LLC
Internet Business Consultants

SEOBOOK
LINKS, RANK, CRAWLERS

dmoz

infospace 

AOL 



Used by thousands of sites!



The webpage c

Most likely causes:

- There might
- If you clicke

What you can try:

I WANT MORE
PageRank



Thumbshots Ranking
Get better SEO Ranking

New Poll

What kind of website do you own?

- ☐ Blog / Personal website
- ☐ Commercial website
- ☐ Non-profit website

[Submit Survey](#) [View Results](#)
[Previous Polls by Online Casino](#)

thumbshots for cross-domain scenarios.

We now allowed Flash applications to pull thumbshots from cross-domain.

Thumbshots.org Gets a New Look!

We redesigned our web pages to make it easier to look for information. Enjoy!

Success story: Blogcatalog.com

The tiny preview of a website help gives users insight of what other bloggers are doing on their own blog site. It entices people to want to click further to satisfy their curiosity. This is one of the major reasons why BlogCatalog.com community is growing so vibrantly and quickly. [Read more...](#)

Success story: SecondBrain

Secondbrain uses Thumbshots website screenshots to give its users more control over what links to click on by enabling to preview a page before clicking. This improves user experience and for the sites thus indexed in Secondbrain's library this is also a valuable branding feature. [Read more...](#)

Thumbshots.com announces new low prices from \$9.99/month & giving 50% more hits!

Check out the new low prices at Thumbshots.com

Search the world's largest web directory at Thumbshots.net!

Great Sites



These Cool Sites use Thumbshots

→ [Shop at AOL](#)

→ [Sanepn.com](#)

→ [Managedq.com](#)

→ [Search-cube.com](#)

→ [ArticleCity.com](#)

[More sites...](#)

Click here to visit
Thumbshots.net

**Now serving over 200
million thumbshots per
month.**

More thumbshot users than
ever before!

**Updated Webmaster
Guidelines.**

Read the latest [Webmaster
Guidelines here.](#)

**Thumbshots available in
phpODP.**

Click here to download code
from [phpODP](#).

**We doubled our server
capacity to handle
growing traffic.**

To accomodate the growing
demand, we've doubled our
server capacities to handle
more load for everyone.

**Thumbshots available in
ODP**

Thumbshots available in
[DWodp Live](#) and [Pro software](#)!

**See the fast growing
number of Sites Using
Thumbshots!**

Click here to see the fast
growing number of [sites using
thumbshots!](#)

**Success story: Listings
with Thumbshots
Receive More Clicks**

The team noticed a visible
percentage increase in the
number of clicks for listings
with thumbshots receive in
comparison to those without

screenshots by up to 5 times.
[Read more...](#)

**Latest poll result: 90% of
responders are visual
people!**

See [poll results](#) here.



Tracking by Google Analytics

[Home](#) | [Products](#) | [Community](#) | [Support](#) | [Demo](#)

Copyright by Thumbshots.com [Terms Of Use](#) [Privacy Statement](#)

EXHIBIT B

User Login

Email Address

☐ Remember me
(requires cookies)

[Forgot your user info?](#)

Not registered?
It's free!

[Make in-adress.com to your homepage](#)

[Webhosting Reviews](#)
[Hosting Solution](#)
[IP Address Management](#)
[Remote IP Address](#)
[Cheap Internet Service](#)
[Internet Security](#)

www.Thumbshots.com - Thumbshots IP Whois / Whois IP

Whois IP? Enter a Domain, IP address or Host for an IP Whois Lookup.

www.Thumbshots.com - Thumbshots site info
www.thumbshots.com IP: 174.36.28.48
www.thumbshots.com server location: Dallas in United States

REDACTED

Thumbshots.com - Thumbshots Whois Information

NOTICE: The expiration date displayed in this record is the date the registrar's sponsorship of the domain name registration in the registry is currently set to expire. This date does not necessarily reflect the expiration date of the domain name registrant's agreement with the sponsoring registrar. Users may consult the sponsoring registrar's Whois database to view the registrar's reported date of expiration for this registration.

The Registry database contains ONLY .COM, .NET, .EDU domains and Registrars.

% The data in the WHOIS database of 1&1 Internet AG is provided by
% 1&1 for information purposes, and to assist persons in obtaining
% information about or related to a domain name registration record.
% 1&1 does not guarantee its accuracy. By submitting a WHOIS query,
% you agree that you will use this data only for lawful purposes and that,
% under no circumstances, you will use this data to
% (1) allow, enable, or otherwise support the transmission by e-mail,
% telephone, or facsimile of mass, unsolicited, commercial advertising or
% solicitations to entities other than the data recipient's own existing
% customers; or
% (2) enable high volume, automated, electronic processes that send queries or
% data to the systems of any Registry Operator or ICANN-Accredited registrar,
% except as reasonably necessary to register domain names or modify existing
% registrations.
% 1&1 reserves the right to modify these terms at any time.
% By submitting this query, you agree to abide by this policy.

domain: thumbshots.com [Who Is Domain](#)
created: 08-May-2001
last-changed: 09-May-2009
registration-expiration: 08-May-2010

nserver: ns1.softlayer.com [Who Is Domain](#) 67.228.254.4 [Who Is IP](#) [trace](#) [Reverse IP Search](#)
nserver: ns2.softlayer.com [Who Is Domain](#) 67.228.255.5 [Who Is IP](#) [trace](#) [Reverse IP Search](#)

status: CLIENT-TRANSFER-PROHIBITED

registrant-firstname: Oneandone
registrant-lastname: Private Registration
registrant-organization: 1&1 Internet, Inc. - <http://1and1.com> [Who Is Domain](#) /contact
registrant-street1: 701 Lee Road, Suite 300
registrant-street2: ATTN: thumbshots.com [Who Is Domain](#)
registrant-pcode: 19087
registrant-state: PA
registrant-city: Chesterbrook
registrant-ccode: US

```
registrant-phone: +1.8772064254
registrant-email: proxy50369@landl-private-registration.com(Who Is Domain)

admin-c-firstname: Oneandone
admin-c-lastname: Private Registration
admin-c-organization: l&l Internet, Inc. - http://landl.com(Who Is Domain)/contact
admin-c-street1: 701 Lee Road, Suite 300
admin-c-street2: ATTN: thumbshots.com(Who Is Domain)
admin-c-pcode: 19087
admin-c-state: PA
admin-c-city: Chesterbrook
admin-c-ccode: US
admin-c-phone: +1.8772064254
admin-c-email: proxy50369@landl-private-registration.com(Who Is Domain)

tech-c-firstname: Oneandone
tech-c-lastname: Private Registration
tech-c-organization: l&l Internet, Inc. - http://landl.com(Who Is Domain)/contact
tech-c-street1: 701 Lee Road, Suite 300
tech-c-street2: ATTN: thumbshots.com(Who Is Domain)
tech-c-pcode: 19087
tech-c-state: PA
tech-c-city: Chesterbrook
tech-c-ccode: US
tech-c-phone: +1.8772064254
tech-c-email: proxy50369@landl-private-registration.com(Who Is Domain)

bill-c-firstname: Oneandone
bill-c-lastname: Private Registration
bill-c-organization: l&l Internet, Inc. - http://landl.com(Who Is Domain)/contact
bill-c-street1: 701 Lee Road, Suite 300
bill-c-street2: ATTN: thumbshots.com(Who Is Domain)
bill-c-pcode: 19087
bill-c-state: PA
bill-c-city: Chesterbrook
bill-c-ccode: US
bill-c-phone: +1.8772064254
bill-c-email: proxy50369@landl-private-registration.com(Who Is Domain)

% See http://registrar.lundl.info(Who Is Domain) for information about l&l Internet AG
```

www.thumbshots.com IP address: 174.36.28.48

>> [My IP address and location](#)
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[Sitemap](#) [Contact](#) [Privacy Policy](#) [Disclaimer](#) [Who Is Domain Index](#) [IP Database](#) [Reverse IP Search](#) [Partner: Registry Fix](#) [Hide my IP](#)

Updated Whois: [bestbuyautoequipment.com](#) [www.vnnv.com](#) [belkemail.com](#) [exploringthepotteries.org.uk](#) [www.a1webdir.net](#) [rainbow-galleries.com](#) [beautvandthedirt.com](#)
[dtdaveanddee.com](#) [www.fawan.com](#) [www.eskimo8tube.com](#) [familyfeud.tv](#)

Latest IP Lookups: [66.75.32.1](#) [81.17.95.186](#) [207.106.239.91](#) [61.62.35.222](#) [80.82.2.35](#)

EXHIBIT C

User Login

Email Address

☐ Remember me
(requires cookies)

[Forgot your user info?](#)

Not registered?
It's free!

[Make ip-adress.com to your homepage](#)

[Webhosting Reviews](#)
[Hosting Solution](#)
[IP Address Management](#)
[Remote IP Address](#)
[Cheap Internet Services](#)
[Internet Security](#)

www.Thumbshots.org - Thumbshots IP Whois / Whois IP

Whois IP? Enter a Domain, IP address or Host for an IP Whois Lookup.

www.thumbshots.org

www.Thumbshots.org - Thumbshots site Info
www.thumbshots.org IP: 174.36.28.48
www.thumbshots.org server location: Dallas in United States

REDACTED

Thumbshots.org - Thumbshots Whois Information

Domain ID:D86742951-LROR
Domain Name:THUMBSHOTS.ORG [Who Is Domain](#)
Created On:20-May-2002 02:21:53 UTC
Last Updated On:21-May-2009 01:23:52 UTC
Expiration Date:20-May-2010 02:21:53 UTC
Sponsoring Registrar:1 & 1 Internet AG (R73-LROR)
Status:OK
Registrant ID:SPAG-33957745
Registrant Name:Oneandone Private Registration
Registrant Organization:l&l Internet, Inc. - <http://land1.com/Who Is Domain> /contact
Registrant Street1:701 Lee Road, Suite 300
Registrant Street2:ATTN: thumbshots.org [Who Is Domain](#)
Registrant Street3:
Registrant City:Chesterbrook
Registrant State/Province:PA
Registrant Postal Code:19087
Registrant Country:US
Registrant Phone:+1.8772064254
Registrant Phone Ext.:
Registrant FAX:
Registrant FAX Ext.:
Registrant Email:proxy50371@land1-private-registration.com [Who Is Domain](#)
Admin ID:SPAG-33957745
Admin Name:Oneandone Private Registration
Admin Organization:l&l Internet, Inc. - <http://land1.com/Who Is Domain> /contact
Admin Street1:701 Lee Road, Suite 300
Admin Street2:ATTN: thumbshots.org [Who Is Domain](#)
Admin Street3:
Admin City:Chesterbrook
Admin State/Province:PA
Admin Postal Code:19087
Admin Country:US
Admin Phone:+1.8772064254
Admin Phone Ext.:
Admin FAX:
Admin FAX Ext.:
Admin Email:proxy50371@land1-private-registration.com [Who Is Domain](#)
Tech ID:SPAG-33957745
Tech Name:Oneandone Private Registration
Tech Organization:l&l Internet, Inc. - <http://land1.com/Who Is Domain> /contact
Tech Street1:701 Lee Road, Suite 300
Tech Street2:ATTN: thumbshots.org [Who Is Domain](#)
Tech Street3:
Tech City:Chesterbrook
Tech State/Province:PA
Tech Postal Code:19087

[illegible]

www.thumbshots.org IP address: 174.36.28.48

>> My IP address and location
Sites like www.thumbshots.org
Reverse DNS / Reverse IP Search for www.thumbshots.org
Trace this Host www.thumbshots.org
Trace any other IP and more Tools

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- 👉 **Hosting Solution**
- 👉 **IP Address Management**
- 👉 **Remote IP Address**
- 👉 **Cheap Internet Service**
- 👉 **Internet Security**



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Updated Whois: www.cuihuashan.com www.copenhagencitytourist.com bestpoliticalblogs.co.uk archervintheschools.org www.24hodin.cz 24carat.co.uk
brunswickvoice.com aminx.com

Latest IP Lookups: [10.216.90.12](#) [98.137.26.186](#) [93.149.150.26](#) [88.85.233.141](#) [62.158.67.118](#)

EXHIBIT D

IP-address.com - IP Tracer and IP Locator. What is my IP address? IP Tracer and IP Locator. [Hello quest sign up now!](#) Remaining lookups today: 3 ([Get more](#))
My IP is: 71.62.73.17

IP Tracing [Home](#) [IP Tracing](#) [Reverse IP](#) [My IP](#) [Hide IP](#) [Email Trace](#) [Speedtest](#) [IP Distance](#) [IP FAQ](#) [Proxy Checker](#) [Who Is Domain/IP](#) [Sitemap](#)

User Login

Email Address

☐ Remember me (requires cookies)

[Forgot your user info?](#)

Not registered? It's free!

[Make ip-adress.com to your homepage](#)

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[Remote IP Address](#)
[Cheap Internet Service](#)
[Internet Security](#)

www.Smartdevil.com - Smartdevil IP Whois / Whois IP

Whois IP? Enter a Domain, IP address or Host for an IP Whois Lookup.

[www.smartdevil.com](#)

Domain Name Provider
Voice, Data, T-1, Mobile, Web Host. Get price quote. Special packages.
[grow.cbeyond.net](#)

Earn Money from Your Site
Registering a domain? Monetize your new site with Google AdSense.
[www.google.com/adsense](#)

Exchange EMail Hosting
Industry Leading Migration Tools & Service. 24x7 Help Desk -Learn More
[www.Internmedia.net](#)

www.Smartdevil.com - Smartdevil site info

www.smartdevil.com IP:
74.86.109.240

www.smartdevil.com server location:
Dallas in United States

www.smartdevil.com ISP:
SoftLayer Technologies

Ads by Google

Smartdevil.com - Smartdevil Whois Information

NOTICE: The expiration date displayed in this record is the date the registrar's sponsorship of the domain name registration in the registry is currently set to expire. This date does not necessarily reflect the expiration date of the domain name registrant's agreement with the sponsoring registrar. Users may consult the sponsoring registrar's Whois database to view the registrar's reported date of expiration for this registration.

The Registry database contains ONLY .COM, .NET, .EDU domains and Registrars.

% The data in the WHOIS database of l&l Internet AG is provided by
% l&l for information purposes, and to assist persons in obtaining
% information about or related to a domain name registration record.
% l&l does not guarantee its accuracy. By submitting a WHOIS query,
% you agree that you will use this data only for lawful purposes and that,
% under no circumstances, you will use this data to
% (1) allow, enable, or otherwise support the transmission by e-mail,
% telephone, or facsimile of mass, unsolicited, commercial advertising or
% solicitations to entities other than the data recipient's own existing
% customers; or
% (2) enable high volume, automated, electronic processes that send queries or
% data to the systems of any Registry Operator or ICANN-Accredited registrar,
% except as reasonably necessary to register domain names or modify existing
% registrations.
% l&l reserves the right to modify these terms at any time.
% By submitting this query, you agree to abide by this policy.

domain: smartdevil.com([Who Is Domain](#))
created: 06-May-2000
last-changed: 07-May-2009
registration-expiration: 06-May-2010

nserver: ns1.softlayer.com([Who Is Domain](#)) 67.228.254.4([Who Is IP](#))([trace](#))([Reverse IP Search](#))
nserver: ns2.softlayer.com([Who Is Domain](#)) 67.228.255.5([Who Is IP](#))([trace](#))([Reverse IP Search](#))

status: CLIENT-TRANSFER-PROHIBITED

registrant-firstname: Oneandone
registrant-lastname: Private Registration
registrant-organization: l&l Internet, Inc. - [http://landl.com\(Who Is Domain\)/contact](http://landl.com(Who Is Domain)/contact)
registrant-street1: 701 Lee Road, Suite 300
registrant-street2: ATTN: smartdevil.com([Who Is Domain](#))
registrant-pcode: 19087
registrant-state: PA
registrant-city: Chesterbrook
registrant-ccode: US
registrant-phone: +1.8772064254
registrant-email: proxy47552@landl-private-registration.com([Who Is Domain](#))

admin-c-firstname: Oneandone
admin-c-lastname: Private Registration
admin-c-organization: l&l Internet, Inc. - [http://landl.com\(Who Is Domain\)/contact](http://landl.com(Who Is Domain)/contact)
admin-c-street1: 701 Lee Road, Suite 300
admin-c-street2: ATTN: smartdevil.com([Who Is Domain](#))
admin-c-pcode: 19087

```
admin-c-state: PA
admin-c-city: Chesterbrook
admin-c-ccode: US
admin-c-phone: +1.8772064254
admin-c-email: proxy47552@landl-private-registration.com(Who Is Domain)

tech-c-firstname: Oneandone
tech-c-lastname: Private Registration
tech-c-organization: l&l Internet, Inc. - http://landl.com(Who Is Domain)/contact
tech-c-street1: 701 Lee Road, Suite 300
tech-c-street2: ATTN: smartdevil.com(Who Is Domain)
tech-c-pcode: 19087
tech-c-state: PA
tech-c-city: Chesterbrook
tech-c-ccode: US
tech-c-phone: +1.8772064254
tech-c-email: proxy47552@landl-private-registration.com(Who Is Domain)

bill-c-firstname: Oneandone
bill-c-lastname: Private Registration
bill-c-organization: l&l Internet, Inc. - http://landl.com(Who Is Domain)/contact
bill-c-street1: 701 Lee Road, Suite 300
bill-c-street2: ATTN: smartdevil.com(Who Is Domain)
bill-c-pcode: 19087
bill-c-state: PA
bill-c-city: Chesterbrook
bill-c-ccode: US
bill-c-phone: +1.8772064254
bill-c-email: proxy47552@landl-private-registration.com(Who Is Domain)

% See http://registrar.lundl.info(Who Is Domain) for information about l&l Internet AG
```

www.smartdevil.com IP address: 74.86.109.240

>> [My IP address and location](#)
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[Trace any other IP and more Tools](#)

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Updated Whois: [www.kaol-shahrukh.com](#) [www.elvacilon.com](#) [www.downloadfreavirus.com](#) [www.mmpc854.com](#) [www.silverbearcave.com](#) [www.smartdrive.net](#) [alvi.ch](#)
[www.ih8mud.com](#) [forwardingweb.com](#) [www.ianplo.net](#) [www.countomat.com](#)

Latest IP Lookups: [76.226.200.228](#) [92.81.17.45](#) [82.208.87.232](#) [114.59.244.227](#) [78.111.53.247](#)

EXHIBIT E

Thumbshots. | Thumbshots. | Thumbshots.net | Research

THUMBSHOTS.COM

Leader in web preview technology. Serving thumbshots to over 1,000 sites.

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Testimonials

"Thanks for the
excellent service you
folks provide. I receive
regular compliments on
our use of Thumbshots."

Ron Rathe
Avidlistener

[More Feedbacks...](#)

THE LEADER IN WEB PREVIEW TECHNOLOGY
"The thumbnail idea is a good one." Michael Rogers, Newsweek.com



seeing is believing

Get Thumbshots

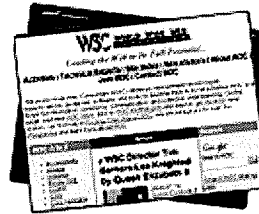
Enhance your search engine,
directory, blog, portals and
web pages.

\$9.99
per month

Start Now

The Leader in Web Preview

Thumbshots.com serves thumbshots to over 1,000 sites every month. We provide thumbshots to the world's largest Web directories, portals and domain registrars. Whether you're searching for a car, flower, photo or girafa, thumbshots will help you find it quickly and accurately.



thumbshots (thŭmbshŏt)

- n. A thumbnail snapshot of a document.
- v. thumbshotted, thumbshotting, thumbshots. To create a thumbnail snapshot.

Thumbshots Ranking

Learn how different internet search engines measure links relevancy. Find out how well your site ranks with small thumbnails beside each link. It's free and fun.

Latest News [more news...](#)

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[Thumbshots.com announces new low prices & 50% more hits!](#)

[Thumbshots.org Launched Free Articles](#)

[Ujiko.com introduces thumbshots on its search engine](#)

[Listings with Thumbshots Receive More Clicks, Useful for Visitors](#)

[Network Solutions Offers Enhanced Whois Lookup](#)

[Has The Yahoo/Google Split Changed Referral Rates?](#)

Free Open Thumbshots

Download free thumbshots images for your web pages from [Thumbshots.org](#). It's easy to integrate thumbshots into your site. Just copy and paste the HTML code. No extra software or hardware required.

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EXHIBIT F

Thumbshots.com | Thumbshots.org | Thumbshots.net | Research

THUMBSHOTS.com

Thumbshots - Click with confidence!

Thumbshots are screenshots of web pages to help you locate web sites quickly and easily. Thumbshots display exactly what you would get before visiting a link. Millions of people trust and rely on thumbshots to take control of their surfing. Whether you're searching for a car, flower, photo or girafa, thumbshots will help you find it quickly and accurately.

Improve Search Accuracy



Every site has a distinctive look and feel making searching easier. For example, a shoe store will display pictures of shoes.

Filter Offensive Sites

REDACTED

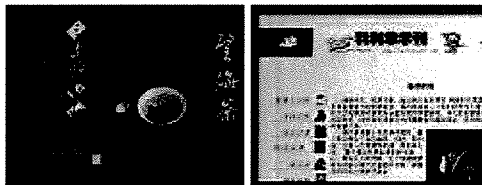
Preview any suspicious sites before visiting. Adult sites are easily recognized by their explicit images.

Locate Ambiguous Sites



For example, when searching for "Angels", you can easily distinguish between a religious site and the Angels baseball team.

Filter Foreign Sites



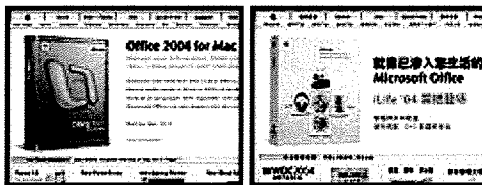
Visualize foreign sites. You can guess the content of a site even if you cannot read the text.

Recall Previously Visited Sites



Relocate previously visited sites quickly. You'll have no problem recognizing sites you've visited just by glancing.

Filter Duplicates & Related Sites



Find duplicate or related sites visually. For example, the two sites are from Apple.com USA and China.

Did you know?

- Millions of people are using thumbshots everyday to help improve their surfing experience.
- Over 90% of users would like to see thumbshots in their favorite search engine.

What People Say About Thumbshots

"The thumbnail idea is a good one."
-- Michael Rogers, Newsweek.com

"Thank you for a great service. It helps me to filter all the spam and porn sites. I feel a lot safer when my kids go online with thumbshots."
-- Cindy Michaels, FL

"Of all the free services and content out there this has got to be the best I've seen in a while, kudos!"
-- Kristopher E.J., GayHouston.net

"Thumbshots make it really easy to find the sites you're looking for. It's a fantastic idea!"
-- David Newman., CA

"I like to whole concept of thumbs!"
-- Bill Graham, IThaki.net

"Great idea, it really helps to visualize the site! Congratulations for your great service."
-- Stephan, Preun

[Click here to read more feedbacks](#)

Send Feedback we love to hear from you!

Name:

Location: State/province/region and country.

E-mail: Your email will not be published.

Feedback:

Help Make The Web A Better Place With Thumbshots!

You too can help improve the Internet by sending your feedback, telling your friends about thumbshots, [becoming a thumbshots sponsor](#) or simply reporting bugs. [Come learn more about us at Thumbshots](#) or simply reporting bugs.

[Preview by Thumbshots.com](#)

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of January, 2010, the attached **REDACTED**
PUBLIC VERSION OF DECLARATION OF SHIRLI RAN IN SUPPORT OF
PLAINTIFF GIRAFA.COM, INC.'S MOTION FOR ENTRY OF DEFAULT
JUDGMENT AGAINST DEFENDANT SMARTDEVIL, INC. was served upon the below-named counsel of record at the address and in the manner indicated:

Stephen Lim
stephen@smartdevil.com

VIA ELECTRONIC MAIL

Justin Lim
jhl@smartdevil.com

VIA ELECTRONIC MAIL

Jeffrey L. Moyer, Esquire
Richards, Layton & Finger, P.A.
One Rodney Square
920 North King Street
Wilmington, DE 19801

HAND DELIVERY

Claude M. Stern, Esquire
Quinn Emanuel Urquhart Oliver & Hedges, LLP
50 California Street, 22nd Floor
San Francisco, CA 94111

VIA ELECTRONIC MAIL

/s/ Tiffany Geyer Lydon

Tiffany Geyer Lydon